

Application No. 09/657,430  
Amendment dated January 29, 2004  
Reply to Office Action of August 4, 2003

### **REMARKS**

Claims 1-20 were pending in the present application; however, by this Amendment new claims 21 and 22 have been added. Thus, upon entry of this Amendment, claims 1-22 will be pending in the present application. Also, by this Amendment, claims 9 and 10 have been amended to provide for the addition of new claim 21, and claims 19 and 20 have been amended to provide for the addition of new claim 22. These changes to claims 9, 10, 19, and 20 are not necessitated by any prior art and are unrelated to the patentability of the present invention. No new matter has been added.

Please note that the Office Action mailed on May 23, 2002 noted that the initialed PTO Form 1449 was attached. Applicants request that another initialed PTO Form 1449 be acknowledged as no copy was attached to the Office Action mailed on May 23, 2002.

### **Telephone Interview**

The courtesy of the interviews granted by Examiner Nguyen on October 30, 2003 and November 3, 2003 is noted with appreciation. During the interviews, the rejections of the present claims were discussed, particularly with respect to Lechner (U.S. Patent No. 6,190,172 B1). It was pointed out to the Examiner that Lechner fails to teach, for example, "at least one display device for displaying the images that are to be projected onto the screens, ... a total number of display devices being smaller than a total number of screens" as recited by claim 1. The Examiner requested that arguments to that effect be submitted in a Response to the present Office Action for consideration. Accordingly, the remarks below include such a discussion of how Lechner fails to teach this limitation.

### **35 U.S.C. § 103(a) Rejections**

#### **Claims 1-6, 9-17, 19 and 20**

Claims 1-6, 9-17, 19 and 20 presently stand rejected under 35 U.S.C. § 103(a) over Lechner (U.S. Patent No. 6,190,172 B1) in view of Suzuki (U.S. Patent No. 6,195,068

B1). Because the proposed combination of Lechner in view of Suzuki does not disclose or suggest all of the limitations of claims 1-6, 9-17, 19 and 20, it is respectfully asserted that claims 1-6, 9-17, 19 and 20 are patentable over the cited art.

Specifically, with respect to claim 1 (and claims 2-6, 9, and 10, which depend from claim 1), this claim recites "at least one display device for displaying the images that are to be projected onto the screens, ... a total number of display devices being smaller than a total number of screens."

This limitation is not disclosed by the proposed combination of Lechner and Suzuki. The present Office Action specifically relies on Lechner for allegedly teaching the above limitation, citing col. 8, lines 15-23. However, the cited portion of Lechner does not appear to discuss anything related to the above limitation:

In one embodiment, the first predetermined aspect ratio of the front screen is greater than one. Thus, the width of the displayed video image is greater than the height of the displayed video image. Typically, the first predetermined aspect ratio is 4:3. In this embodiment, the second predetermined aspect ratio of each side screen is preferably less than 1. Thus, the width of the displayed video image on each side screen is less than the height of the displayed video image. For example, the second predetermined aspect ratio can 3:4. (Lechner, col. 8, lines 15-23).

The cited portion of Lechner is a discussion related to aspect ratios of screen, and as such it addresses nothing involving a number of display devices compared to a number of screens.

On the other hand, Lechner does provide disclosure that teaches away from the above-quoted portion of claim 1. For example, claim 1 requires that a total number of display devices be *smaller* than a total number of screens. However, Lechner teaches having a total number of display devices *equal* to a total number of screens at Fig. 4, col. 6, lines 65-67, and col. 8, lines 52-60. Note that claim 1 requires that the "display device" is "for displaying the images." Lechner at col. 8, lines 52-58 discloses that each projector 28 includes its own display device, in this case a respective cathode ray tube

(CRT) (using the AMPRO 3300 CRT video projector as an example). Thus, according to the teachings of Lechner, each video projector 28 includes a display device, such as a CRT. That produced, consideration can be made as to what Lechner discloses with respect to the number of video projectors (and thus the number of display devices) compared to the number of screens. To this end, Lechner discloses the following:

The video projection means 28 preferably includes a plurality of video image projectors, *at least one of which is associated with each display screen 12*. Typically, the video projectors are either cathode ray tubes or light valve projectors. For full color background images, the video projectors are generally RGB projectors, such as BARCO 1208 projectors or Ampro 3300 projectors, which project a video image having red, green and blue color components. However, a monochrome video projector which produces a monochromatic video image can also be employed without departing from the spirit and sign of the present invention. (Lechner, col. 6, lines 65-67 – col. 7, lines 1-9) (emphasis added).

Thus, it will be appreciated that Lechner discloses a one-to-one relationship between the number of projectors and the number of screens, each projector having at least one CRT display device. Therefore, Lechner teaches having one (or more) display device for each screen.

It is noted that, during the telephone interview, the examiner alleged that the image generator 26 shown in Fig. 4 was considered a “display device” according to claim 1. However, this allegation is respectfully traversed. As mentioned above, claim 1 requires that the display device is “for *displaying* images” (emphasis added). With respect to the image generator 26, Lechner discloses that this device is, as its name suggests, for generating video signals:

The image displayed on the plurality of display screens 12 is generally generated by an image generation system 26. As known to those skilled in the art, *the image generation system generates video signals* representative of the three-dimensional video images to be displayed on the display screens. In particular, the image generation system is generally adapted to provide frames of video signals representative of the three-dimension video images at a predetermined frequency or frame rate, such as 60 hertz. (Lechner, col. 6, lines 35-43) (emphasis added).

Thus, the image generation system 26 disclosed in Lechner is a processing device for generating video signals. On the other hand, Lechner is silent with respect to the image generation system 26 displaying images, so there is therefore no basis for the above-mentioned allegation that that the image generation system can be considered a display device.

With respect to Suzuki, this reference neither teaches nor is relied upon in the Office Action to teach "a total number of display devices being smaller than a total number of screens" as recited by claim 1.

Considering as discussed above, that both Lechner and Suzuki fail to teach "a total number of display devices being smaller than a total number of screens" as recited by claim 1, it follows that if one skilled in the art were to consider the proposed combination of Lechner and Suzuki, this proposed combination would still fail to disclose or suggest "a total number of display devices being smaller than a total number of screens" as recited in claim 1. Since the proposed combination of Lechner and Suzuki fails to disclose or suggest all of the limitations of claim 1, the proposed combination of Lechner and Suzuki cannot render obvious claim 1, or claims 2-6, 9, and 10 which depend from claim 1.

With respect to claim 11 (and claims 12-17, 19, and 20, which depend from claim 11), this claim recites "a total number of display devices being smaller than a total number of screens." Thus, it is respectfully asserted that claim 11, as well as claims 12-17, 19, and 20, are considered to be patentably distinguish over the proposed combination of Lechner and Suzuki for at least the reasons discussed above in connection with claim 1.

Accordingly, it is respectfully requested that the rejection of claims 1-6, 9-17, 19 and 20 under 35 U.S.C. § 103(a) over Lechner in view of Suzuki be reconsidered and withdrawn.

**Claims 7, 8, 17, and 18**

Claims 7, 8, 17, and 18 presently stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lechner in view of Suzuki, and further in view of Yamazaki (U.S. Patent No. 6,377,230 B1). Because the proposed combination of Lechner, Suzuki, and Yamazaki does not disclose or suggest all of the limitations of claims 7, 8, 17, and 18, it is respectfully asserted that claims 7, 8, 17, and 18 are patentable over the cited art.

Specifically, with respect to claims 7 and 8, these claims depend from claim 1, which recites “at least one display device for displaying the images that are to be projected onto the screens, ... a total number of display devices being smaller than a total number of screens.”

This limitation is not disclosed by the proposed combination of Lechner, Suzuki, and Yamazaki. With respect to Lechner and Suzuki, the fact that these references, alone or in combination, fail to teach or suggest “a total number of display devices being smaller than a total number of screens” is addressed above in connection with claim 1, and is equally applicable to claims 7 and 8, which depend from claim 1. With respect to Yamazaki, this reference neither teaches nor is relied upon in the Office Action to teach “a total number of display devices being smaller than a total number of screens” as recited by claim 1. Therefore, it follows that if one skilled in the art were to consider the proposed combination of Lechner, Suzuki, and Yamazaki, this proposed combination would still fail to disclose or suggest “a total number of display devices being smaller than a total number of screens” as recited in claim 1. Since the proposed combination of Lechner, Suzuki, and Yamazaki fails to disclose or suggest all of the limitations of claim 1, the proposed combination of Lechner, Suzuki, and Yamazaki cannot render obvious claim 1, or claims 7 and 8 which depends from claim 1.

With respect to claims 17 and 18, these claims depend from claim 11, which recites “a total number of display devices being smaller than a total number of screens.” Thus, it is respectfully asserted that claim 11, as well as claims 17 and 18, are considered

to patentably distinguish over the proposed combination of Lechner, Suzuki, and Yamazaki for at least the reasons discussed above in connection with claims 7 and 8.

Accordingly, it is respectfully requested that the rejection of claims 7, 8, 17, and 18 under 35 U.S.C. § 103(a) over Lechner in view of Suzuki, and further in view of Yamazaki, be reconsidered and withdrawn.

### **New Claims**

New claims 21 and 22 have been added to provide a more adequate basis for protection of the present invention. No new matter has been added. Of the new claims, claim 21 depends, indirectly, from claim 1, and claim 22 depends, indirectly, from claim 11. Therefore, claims 21 and 22 are considered to patentably distinguish over the cited art for at least the reasons discussed above in connection with claims 1 and 11, respectively.

### **CONCLUSION**

In view of the foregoing amendments and remarks, this application is considered to be in condition for allowance, and an early reconsideration and a Notice of Allowance are earnestly solicited.

This Amendment increases the total number of claims by two from twenty to twenty-two, but does increase the number of independent claims, and does not present any multiple dependency claims. Accordingly, a Response Transmittal and Fee Authorization form authorizing the amount of \$36.00 to be charged to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260 is enclosed herewith in duplicate. However, if the Response Transmittal and Fee Authorization form is missing, insufficient, or otherwise inadequate, or if a fee, other than the issue fee, is required during the pendency of this application, please charge such fee to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260.

Application No. 09/657,430  
Amendment dated January 29, 2004  
Reply to Office Action of August 4, 2003

If an extension of time is required to enable this document to be timely filed and there is no separate Petition for Extension of Time filed herewith, this document is to be construed as also constituting a Petition for Extension of Time Under 37 C.F.R. § 1.136(a) for a period of time sufficient to enable this document to be timely filed.

Any fee required for such Petition for Extension of Time, and any other fee required by this document, other than the issue fee, and not submitted herewith, should be charged to Sidley Austin Brown & Wood LLP's Deposit Account No. 18-1260. Any refund should be credited to the same account.

Respectfully submitted,

By: \_\_\_\_\_



Douglas A. Sorensen  
Registration No. 31,570  
Agent for Applicants

DAS/llb:bar  
SIDLEY AUSTIN BROWN & WOOD LLP  
717 N. Harwood, Suite 3400  
Dallas, Texas 75201  
Direct: (214) 981-3482  
Main: (214) 981-3300  
Facsimile: (214) 981-3400  
January 29, 2004

DA1 270977v3